



United States Environmental Protection Agency

Region 10 Emergency Response Unit

POLLUTION REPORT

I. HEADING

Date: February 14, 2000
Subject: CleanCare Removal Site (CleanCare), Tacoma, Washington
From: Michael Szerlog, OSC, USEPA, Region 10, Emergency Response Unit
Tel: Office (206) 553-0279
TO: See Distribution List on last page

POLREP No.9 (Progress)

II. BACKGROUND

Site ID: SSID # 106W
Delivery Order No: 081-10 -02
Response Authority: CERCLA,
CERCLIS No: WASFN1002182
NPL Status: Not Listed (former RCRA site within Commencement Bay Superfund site)
State Notification: Washington State Department of Ecology referred site to EPA
Action Memo Status: Signed on December 17, 1999 and January 7, 2000
Removal Start Date: December 17, 1999
Expected Completion Date: March 17, 2001
Site Web Page: www.epa.gov/r10earth, click Index, click C for CleanCare. or use URL: <http://epainotes1.rtpnc.epa.gov:7777/r10/cleanup.nsf/sites/CleanCare>

III. SITE INFORMATION

A. Incident Category

This is a time-critical removal action at an inactive waste management facility

B. Site Description

1. Site Location

The CleanCare site is located at 1510 Taylor Way in Pierce County, City of Tacoma, Washington at Township 21, Range 3 E. in Section 26. The site comprises approximately 4.2 acres latitude 47° 16' 25" North and

longitude 122° 23' 32" West. The site is located in the "Tacoma Tideflats" area about three miles northeast of downtown Tacoma. The site is owned by David Bromley of Bromley-Marr ECOS Inc.

The CleanCare site was an interim status treatment, storage, disposal, and recycling (TSD) facility for off-site generated hazardous and non-hazardous wastes - one of a handful of commercial TSDs operating in the state of Washington. When the facility was in operation its major function was to solidify oily sludge wastes originating from catch basins, sumps, and storm drains; recycle waste oils, antifreeze, and spent solvents; and crush used oil filters for off-site recycling by other facilities.

The CleanCare facility has four separate tank farms (Tank Farm (TF)-1, TF-2, TF-3, and TF-4), two hazardous/dangerous waste container storage pads (container storage (CS) CS-4A and CS 4-B), and a processing area where the distillation of solvent, oil, and antifreeze used to occur.

IV. Response Information

A. Situation

1. Current Situation

February 7, 2000 (Monday)

Personnel on site: 4 START, 11 ERRS, 3 USCG,

Weather: Cool, overcast with drizzle

All site personnel attended daily safety meeting and discussed site safety and planned activities. START sampled water staged for discharge into sewer system per City of Tacoma. Continued to inventory RCRA drums. ERRS received rollofs for crushed oil filter drums and continued crushing oil filter drums, recorded RCRA drums by generator and staged RCRA drums over 250 gallons by generators. Pumped contact water from Baker Tank 1 to Tank 21 for treatment, treated contact water, and circulated treated water in Tank 22. Pumped non contact water to oil water separator, and oil water separator to Lincoln Ave. as needed.

February 8, 2000 (Tuesday)

Personnel on site: 4 START, 11 ERRS, 3 USCG, 1 EPA

Weather: overcast, rain, windy, high 45 F

All site personnel attended daily safety meeting and discussed site safety and planned activities. START sampled surface water discharge. Continued to inventory RCRA drums. ERRS loaded 3.5 rollofs with crushed oil filter drums, took meter readings on site and in Baker Tanks 15 & 16, and cleaned Baker Tanks 15 & 16.

Pumped contact water and non contact water on site to appropriate areas and pumped 45,000 gallons of waste water out of Baker

Tanks 12, 15, and 1 to Philips Services for off site disposal. Obtained 4 additional rollofs for crushed oil filter drums. Disposed of 2 rollofs of used oil filter drums.

February 9, 2000 (Wednesday)

Personnel on site: 5 START, 11 ERRS, 3 USCG, 5 EPA

Weather: partially sunny, occasional light rain high of 45 F.

All site personnel attended daily safety meeting and discussed site safety and planned activities. START continued inventory of RCRA drums. Finalized work, including amendments, on the Special Approved Discharge (SAD) application for discharge of treated water to the City of Tacoma Sanitary Sewer. ERRS continued recording RCRA drums by generator and staging RCRA drums totaling over 250 gallons by generator, continued crushing oil filter drums, wiped down Baker Tank 15, filled 1.5 rollofs with crushed oil filter drums and started crushing RCRA drums, removed 2 rollofs filled with oil filter drums, Pumped water from Tank Farm 1 to Baker Tank 12, removed Baker Tank 15 and placed Baker Tank 16 by the treatment system, and acquired supplies for sampling Aboveground Storage Tank (AST) T-1 and drums. Additional EPA personnel were on site supporting the Civil Investigation by accessing site computers, inventory systems, and searching for manifests.

February 10, 2000 (Thursday)

Personnel on site: 5 START, 11 ERRS, 3 USCG, 4 EPA

Weather: Clear, light breeze, cold, high lower 40's

All site personnel attended daily safety meeting and discussed site safety and planned activities. START continued inventory and data entry for RCRA waste drums, documented sampling of drums in Building 5, and continued oversight of on site activities. ERRS continued crushing RCRA drums, started pulling samples from drums in Building 5 and performed hazard categorization tests, took samples every 2 feet in AST T-1 located in Tank Farm 1, treated contact water in Baker Tank 1, and assisted Phillips Services Corp. loading trucks with contact water from Baker Tanks 1 and 12. 38,400 gallons of contact waste water were removed from the site.

February 11, 2000 (Friday)

Personnel on site: 6 START, 11 ERRS, 3 USCG, 2 EPA

Weather: Overcast, light breeze, high in the mid 40's

All site personnel attended daily safety meeting and discussed site safety and planned activities. START completed inventory of RCRA waste drums and continued with associated data entry, continued oversight of activities on site, received SAD permit from City of Tacoma for the discharge of treated waste water to the city sanitary sewer. ERRS cleaned Baker Tank (BT) #1, pumped water

from BT #12 into BT #11, collected samples of oil drums in Building #5, started cleaning the paint related drums for shipment.

February 12, 2000 (Saturday)

No site activity.

2. Removal Actions to Date

On January 7, 2000, the Action Memorandum to increase site ceiling, to ask for a \$2 million exemption, a 12-month exemption, and a change of scope was signed. A purchase request was also signed and ERRS was funded, incrementally, to begin removal activities.

The State (Washington Department of Ecology) and the City (City of Tacoma Public Works) continue to provide assistance with discharge of non-contact storm water.

Drums -	<p><u>Oil Filter Drums:</u> This week, four 30-cubic yard rollofs of used oil filter drums were removed from the site. A total of nine rollofs of used oil filters and four rollofs of used oil filter drums have been removed from the site.</p> <p><u>RCRA Drums:</u> Finished segregation and inventory of all non oil filter drums known to be located on the site (formerly referred to as RCRA drums).</p> <p><u>Oil Drums in Building #5:</u> Started sampling and collecting data for the oil drums located in the southern portion of Building #5. The material from these drums will be pumped into a 6,000 gallon storage tank prior to disposal to reduce disposal costs.</p>
Baker Tanks -	<p>Started treating and recirculating water in Baker Tanks in preparation for discharge in accordance with the SAD. The SAD was finalized late on Friday so no discharge was made to the City of Tacoma Sanitary Sewer System. Baker Tanks are decontaminated and returned to the vendor after they are emptied. To date, samples have been taken to characterize all Baker Tanks on site.</p>

- Surface Water - This week, started treating contact surface water and decontamination water with the temporary waste water treatment system. Applied for and received a permit for discharge to the Tacoma Sanitary Sewer. Continued sampling and pumping non contact surface water to the Lincoln Ave. ditch, under agreement with Washington State Department of Ecology.
- ASTs - AST T-1 was sampled at 2 foot depth intervals for flash point by the ERRS contractor for disposal characterization. To date all of the tanks in Tank Farm 1 (T-1, T-3, T-4, and T-5) have been sampled.
- Soil - No work was performed this week regarding site soils. To date, 14 soil samples were collected during the assessment phase to characterize site soils.

A START contracted temporary employee provided assistance to EPA Civil Investigations by photocopying documents specified.

3. Enforcement

The Region currently has some information regarding potential responsible parties (PRPs) at the site. EPA intends to gather additional PRP information during the removal action.

B. Planned Removal Activities

To minimize/eliminate to threat to human health and the environment posed by the wastes on the site, the following removal activities are planned:

- Drums - organization of drums and documents (manifests & profile analyses), generator notification, hazard categorization and disposal tests, and removal of containers from the site. A meeting at CleanCare is scheduled for February 22, 2000. At this meeting generators with wastes stored in drums/containers will have the opportunity to identify their waste and schedule a time to remove their waste from the site.
- Baker Tanks - sampling, handling of contents (onsite treatment or off site disposal), cleaning tanks, and removal of tanks from the site. The water from some tanks will

	continue to be treated on site and discharged. At the same time, water from other Baker Tanks will continue to be shipped off site.
Surface Water -	manage surface water as it collects onsite (including sampling, treatment, and discharge), clean concrete and asphalt surfaces that currently impact surface water, establish and implement a long term. plan/recommendation for surface water management including possibly construction of an asphalt cap.
ASTs -	sampling, handling of contents (off site disposal or combination of onsite treatment and off site disposal anticipated), clean tanks, possible dismantling of some tanks and containment structures and remove from site
Soil -	Possible further sampling prior to excavation, confirmation sampling, and removal from site or onsite treatment. Installation of asphalt cap if deemed necessary.

C. Next Steps

EPA, ERRS, START, and the USCG Strike Team to continue managing onsite surface water. Complete the data management for all RCRA drums, locate and file the manifests for the RCRA drums, and prepare for generator recovery of waste drums. Treat some Baker Tank water, ship some of it off site. Discharge treated water to the Tacoma Sanitary Sewer, in accordance with the Special Approved Discharge (SAD). Decontaminate Baker Tanks as they are emptied and return them to the vendor.

D. Key Issues

Security Off Duty City of Tacoma Police continue with site security.

Discharge of non contact waters Noncontact surface water is being discharged to the Lincoln Avenue Ditch, as needed, with daily permission of the Washington State Department of Ecology (DOE). Discharge requirements established by DOE are being followed.

Management of contact water; Contact surface water (that which falls with in the secondary containment structures) is being pumped into temporary storage tanks (Baker Tanks). This water will has been analyzed and some of it is being treated and discharged and some is being disposed off site. Performing both tasks simultaneously will reduce the length of time required to accomplish this task, reduce the associated costs, such as Baker Tank rental fees, and remove the threat of a release.

Drum/Container Waste; Generators of site waste stored in drums/containers will have the opportunity dispose of their wastes. This process will include a meeting on site February 22, 2000.

V. Cost Information

Estimated costs are summarized below

	Established Ceiling	Estimated Costs (as of 2/12/00)
EPA	\$ 150,000	\$ 12,920
START	\$ 350,000	\$ 59,374
ERRS	\$ 1,100,000	\$ 456,860
Coast Guard	<u>\$ 100,000</u>	<u>\$ 27,714</u>
Total	\$ 1,700,000	\$ 556,868

Note: The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

VI Disposition of Wastes

Waste Stream	Medium	Quantity	Containment-Migration Control	Treatment	Disposal
used oil filters	solid and solidified waste	270 cu yd	placed liners in rolloffs	removed oil filters from 55 gallon drums and consolidated in rolloffs	Waste Management delivered to Olympic View Sanitary Landfill
used oil filter drums	solid waste	120 cu yd	placed liners in rolloffs	crushed drums with an excavator to reduce volume	Phillips Services Corp. Delivered to Bethlehem Steel for recycling.
oily debris	solidified waste	20 cu yd	placed liners in rolloffs	consolidated in rolloffs	Phillips Services Corp. delivered to Olympic View Sanitary Landfill
Contact Rain Water	liquid	19,300 gal	contained in Baker Tank	Emerald Petroleum Services's (EPS) water treatment plant	EPS, to City of Tacoma Sanitary Sewer
Contact Rain Water	liquid	83,400 gal	contained in Baker Tank	Phillips Services Corp. water treatment plant	Phillips Services Corp. to City of Tacoma Sanitary Sewer
Contact Rain Water	liquid	Not disposed yet	contained in Baker Tank	Treated on Site with Temporary Waste Water Treatment System	To City of Tacoma Sanitary Sewer
Baker Tanks	solid	Tank 15	NA	Pressure Washed, and wiped down	Returned to Vendor (Baker Tanks, Inc.)

Used oil filters have been removed from site to free up room to stage, sort, and segregate the large volume of drums on site. The drums containing the filters were located in Building 5, inside of on-site tractor trailer trucks, and co-mingled with regulated wastes. Currently, the same is being done with the oil drums located in the southern part of Building 5.

VII Distribution

To: EPA Headquarters, Washington, D.C. Attention: Terry Eby
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EPA Washington Operations Office, Attention: Julie Hagensen
Washington State Department of Ecology, Attention: Jim Sachet
City of Tacoma Public Works Department, Attention: Michael Kennedy
EPA Region 10 Web page, Attention: Beth Kunz
EPA Region 10, Emergency Response Unit, Attention: OSCs

VII Status

Case Pending.